

1 The Honorable Stanley A. Bastian
2

3 William D. Pickett, WSBA #27867
4 THE PICKETT LAW FIRM
5 917 Triple Crown Way, Ste. 100
6 Yakima, Washington 98908
7 Tel: 509-972-1825
8 bill@wpickett-law.com
9 *Attorney for Plaintiff*

10 Luan T. Le, *pro hac vice*
11 Law Offices of Luan T. Le
12 1190 S. Bascom Ave, Suite 213
13 San Jose, CA 95128
14 Tel: 408-247-4715
15 Email: ledowningllp@gmail.com
16 *Co-counsel for Plaintiff*

17 Seth W. Wiener, *pro hac vice*
18 Law Offices of Seth W. Wiener
19 609 Karina Court
20 San Ramon, CA 94582
21 Tel: 925-487-5607
22 Email: seth@sethwienerlaw.com
23 *Co-counsel for Plaintiff*

24 **UNITED STATES DISTRICT COURT**
25 **EASTERN DISTRICT OF WASHINGTON**

26 DEMETRIOS VORGIAS,

27 Plaintiff,

28 v.

29 COMMUNITY HEALTH OF CENTRAL
30 WASHINGTON,

31 Defendant.

Case No.: 1:21-cv-03013-SAB

**PLAINTIFF'S WITNESS
AND EXHIBIT LIST**

32 Pursuant to the Court's Amended Scheduling Order of October 8, 2021,
33 (ECF No. 24), Plaintiff identifies the following witnesses and exhibits. As noted
34 in the Court's Order, Plaintiff's trial exhibits are to be numbered 1 through 199:

A. WITNESSES.

1. Demetrios Vorgias, c/o Luan T. Le, 1190 S. Bascom Ave, Suite 213, San Jose, CA 95128, Tel: (408) 247-4715. This person has discoverable information concerning: (a) Plaintiff's disabilities; (b) Plaintiff's residency at Community Health of Central Washington ("CHCW"); (c) CHCW's discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

2. Rebecca Ward – (Plaintiff's Wife). This person has information concerning Plaintiff's disabilities, residency at CHCW and damages.

3. Kelly Cornett, PsyD, CBIS, Rehabilitation Institute of Washington, PLLC, 415 1st Avenue N., Suite 200, Seattle, WA 98109, Tel.: (206) 859-5036. This person has discoverable information concerning: (a) Plaintiff's disabilities.

4. Micahlyn Powers, MD, CHCW's Residency Program Director, Tel.: (509) 452-4946. This person has discoverable information concerning: (a) Plaintiff's disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

5. Tess Ish-Shalom, DO MS, 5373 Main Street, Hillsboro, OR 97123. This person has discoverable information concerning: (a) Plaintiff's disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

6. Mark J. Bauer M.D., P.O. Box 580, Naches, WA 98937. This person has discoverable information concerning: (a) Plaintiff's disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

7. Ed Prasthofer MD, 108 C Street, Salt Lake City, Utah, 84103,
Tel.: (303) 877-1922. This person has discoverable information concerning: (a)

1 Plaintiff's disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's
2 discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

3 8. Douglas E. Coon, Regional Medical Director, West Division
4 Envision Healthcare Inc., Tel.: (360) 420-3817. This person has discoverable
5 information concerning: (a) Plaintiff's disabilities; (b) Plaintiff's residency at
6 CHCW; (c) CHCW's discriminatory treatment of Plaintiff; (d) Plaintiff's
7 damages.

8 9. Judith Harvey MD, 902 S 31st Avenue, Yakima WA 98902. This
9 person has discoverable information concerning: (a) Plaintiff's disabilities; (b)
10 Plaintiff's residency at CHCW; (c) CHCW's discriminatory treatment of
11 Plaintiff; (d) Plaintiff's damages.

12 10. Carlin Miller DO, 1806 W Lincoln Avenue, Yakima WA 98902,
13 Tel.: (509)823-6566. This person has discoverable information concerning: (a)
14 Plaintiff's disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's
15 discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

16 11. Laura Moss MD, Washington Physician's Health Program 720
17 Olive Way Suite 1010, Seattle WA 98101-1819. This person has discoverable
18 information concerning: (a) Plaintiff's disabilities and requests for
19 accommodation(s).

20 12. Cynthia Morales MA, LMHC; Washington Physician's Health
21 Program 720 Olive Way Suite 1010, Seattle WA 98101-1819. This person has
22 discoverable information concerning: (a) Plaintiff's disabilities, and requests
23 for accommodation(s).

24 13. Dr. Scott Whitmer PsyD; Whitmer and Associates, Inc. 205 N 40th
25 Avenue Suite 203, Yakima WA 98908. This person has discoverable
26 information concerning: (a) Plaintiff's disabilities, (b) Plaintiff's Damages.
27
28

1 14. Dr. Ben E. Kitchens MD, 302 Kaki Street, Iuka MS 38852. This
2 person has discoverable information concerning: (a) Plaintiff's disabilities,
3 medical knowledge, professional abilities, and damages.

4 **B. EXHIBITS.**

5 Pursuant to the Court's Amended Scheduling Order, Plaintiffs further
6 provide a description of the exhibits they may offer at the time of trial. Plaintiffs
7 reserve the right to object to the admissibility of any such exhibit, and reserve
8 the right not to offer at trial.

9 1. Previously disclosed/produced, marked herein as Plaintiff's Ex. No.
10 1; Titled: Central Washington Family Medicine Residency Program Resident
11 Handbook.

12 2. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
13 No. 2; Titled: Central Washington Family Medicine Residency Program
14 'Resident Contract in Family Medicine'.

15 3. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
16 No. 3; Titled: Central Washington Family Medicine Residency Verification of
17 Graduate Medical Education & Training.

19 4. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
20 No. 4; Titled: December 11, 2019 letter from Dr. Laura Moss, MD and Cynthia
21 Morales, MA, LMHC at Washington Physicians Health Program (WPHP).

22 5. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
23 No. 5; Titled: April 19, 2019 email from Cynthia Morales at WPHP to Dr.
24 Micahlyn Powers.

25 6. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
26 No. 6; Titled: Neuropsychological Assessment Report of Dr. Kelly Cornett,
27 PsyD, CBIS at Rehabilitation Institute of Washington, PLLC.
28

1 7. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
2 No. 7; Titled: Plaintiff Demetrios Vorgias' Supplemental Initial Disclosure re:
3 Damages (Economic Loss tables only, for illustrative purposes).

4 8. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
5 No. 8; Titled: Plaintiff's FRCP 26 Initial Expert Witness Disclosure/Report of
6 Dr. Scott Whitmer (for illustrative purposes only).

7 9. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
8 No. 9; Titled: Plaintiff's Letters of Recommendation from CHCW staff.

9 10. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
10 No. 10; Titled: Medical Residency Jobs Plaintiff Applied to via Medical
11 Residency Portal.

12 11. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
13 No. 11; Titled: St. George's University Medical Student Performance
14 Evaluation.

15 12. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
16 No. 12; Titled: ACGME Institutional Requirements.

18
19 DATED this 31st day of January, 2022.

20
21
22 THE PICKETT LAW FIRM
23 By: s/William Pickett
24 William D. Pickett, WSBA #27867
25 917 Triple Crown Way, Suite 100
26 Yakima, WA 98908
27 bill@wpickett-law.com
28 *Attorney for Plaintiff*

22 LAW OFFICES OF SETH W.
23 WIENER
24 By: s/Seth W. Wiener
25 Seth W. Wiener, CSBA #203747
26 609 Karina Court
27 San Ramon, CA 94582
28 Email: sethwiener@yahoo.com
 *Attorney for Plaintiff – Pro Hac
 Vice*

1 LAW OFFICES OF LUAN T. LE
2 By: s/Luan Le
3 Luan T. Le. CSBA #171029
4 1190 S Bascom Avenue, Suite 213
5 San Jose, CA 95128
6 Email: ledowningllp@gmail.com
7 *Attorney for Plaintiff – Pro Hac Vice*

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Luong T. Le, *pro hac vice*
Law Offices of Luan T. Le
1190 S. Bascom Ave, Suite 213
San Jose, CA 95128
Tel: 408-247-4715
Email: ledowningllp@gmail.com
Co-counsel for Plaintiff

Seth W. Wiener, *pro hac vice*
Law Offices of Seth W. Wiener
609 Karina Court
San Ramon, CA 94582
Tel: 925-487-5607
Email: seth@sethwienerlaw.com
Co-counsel for Plaintiff

Catharine Morisset, WSBA #29682
Nate Bailey, WSBA #40756
Fisher & Phillips, LLP
1201 Third Avenue, Ste. 2750
Seattle, Washington 98101
Tel: 206-682-2308
Email: cmorisset@fisherphillips.com
nbailey@fisherphillips.com
Attorneys for Defendant

DATED at Yakima, Washington, this 31st day of January, 2022.

By: s/ William D. Pickett
William D. Pickett, WSBA NO. 27867